



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

March 24, 2008

Reply To
Attn Of: ETPA-088

Ref: 05-044-AFS

Tom Rielly
Forest Supervisor
Clearwater National Forest
12730 U.S. Highway 12
Orofino, ID 83544

Dear Mr. Rielly:

The U.S. Environmental Protection Agency (EPA) has completed its review of the draft Environmental Impact Statement (DEIS) for the proposed Yakus Creek Project (CEQ No. 20080037) in accordance with our authorities and responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The Clearwater National Forest (the Forest) is proposing to treat the Yakus Creek project area to improve forest health; improve soil productivity and water quantity and quality conditions; and manage the landscape to provide for goods and services. The proposed action would treat approximately 2,165 acres within the 7,900 acre project area. The DEIS considers a no-action alternative and two action alternatives:

1. Alternative 1 – No Action. This alternative represents the existing condition.
2. Alternative 2 – Proposed Action and Preferred Alternative. Under this alternative the Forest would conduct 220 acres of regeneration harvest, 226 acres of commercial thinning, and conduct precommercial thinning on 1,620 acres. Road activity would include 1.6 miles of new road construction, 2.5 miles of road reconstruction, and 1.7 miles of temporary road construction. Following regeneration harvest, prescribed fire would be applied. Watershed restoration activities proposed include decommissioning 11.5 miles of existing roads, placing 3 miles into intermittent storage, reconstructing 2.5 miles of roads, and improving 90 acres of compacted soils on old skid trails and landings. Access management activities include constructing 1.4 miles of Off Highway Vehicle (OHV) connector trails, closing a total of 4.5 miles of road to full-size vehicles.
3. Alternative 4 – This alternative focuses on using the existing road system and excludes regeneration harvest. A total of 214 acres would be treated with commercial thinning, and 1,620 acres would be precommercially thinned. 1.6 miles of road would be reconstructed, 10.7 miles would be decommissioned, 4 miles would be placed into intermittent storage, and 80 acres of compacted soils would be improved.

Our review focused on Alternative 2, the preferred alternative. EPA is fully supportive of the identified purpose and need as it relates to improving forest and watershed health. We also

commend the Forest for the analysis that was undertaken during the scoping phase of this project to screen out areas with old growth characteristics and move the Forest toward meeting the 10% standard. We continue, however, to have questions about the level of obliteration to be applied to roads proposed for closure, the need for the proposed OHV connector trails, and potential impacts to sourcewater. These issues are detailed in the attached comments.

Based on the information provided, we are rating the DEIS as EC-1 (Environmental Concerns – Adequate). An explanation of this rating is enclosed. We appreciate the opportunity to comment on draft EIS. Please feel free to contact Teresa Kubo at (503) 326-2859 with any questions that you may have.

Sincerely,

/s/
Christine Reichgott, Manager
NEPA Review Unit

Enclosures

EPA Detailed Comments on the Yakus Creek Draft Environmental Impact Statement

Purpose and Need

Page 4 of the DEIS identifies the provision of “goods and services” among purposes of the Yakus Creek project. The document does not, however, clearly articulate the need for the establishment of new OHV connector trails. We recognize that there is a need to provide the public with a broad array of recreational opportunities, but it is not clear in the DEIS whether opportunities for OHV recreation are limited. In general, decisions about new recreational facilities (such as trails) should be based on evidence and evaluation of: 1) increased public need; 2) the need to reduce concentration on, or conflicts at, existing sites; or 3) the need to reduce resource degradation from recreation use at existing sites.

Recommendation:

We recommend that the DEIS further evaluate the need for an additional 1.4 miles of OHV connector trails.

Impact Assessment

Page 102 of the DEIS indicates that the proposed OHV connector trails would ultimately tie into connecting routes from the Pete King and Musselshell OHV areas. The document does not, however, analyze the potential for impact associated with increased OHV use in these areas. This is of particular concern as the 2003 Clearwater National Forest Roads Analysis Report identified Pete King Creek and Lolo Creek above Musselshell Creek as areas of concern due to road-related impacts.

Recommendation:

We recommend that the DEIS analyze any potential impacts that could arise from increased OHV use/access within and adjacent to the project area. This should include consideration of impacts to habitat, water quality, and the risk of introducing invasive species.

Water Quality/Aquatic Resources

Among the proposed watershed improvement activities, the DEIS identifies the decommissioning of 11.5 miles of existing road. EPA is fully supportive of this action as roads modify terrestrial and aquatic resources significantly, affecting fish, wildlife, water quality, and stream/wetland processes. Page 18 indicates that there are four levels of road obliteration, ranging from full recontouring of the hill slopes (complete obliteration) to abandonment of the road. For those road miles adjacent to water bodies, we recommend that the FEIS indicate which level of abandonment will be applied. Specifically, we note that 1.6 miles of permanent road would be constructed on the ridge south of Molly Creek to replace several road segments that currently run adjacent to Molly Creek and Nan Creek. We seek clarification of the level of obliteration to be applied to these road segments.

Recommendation

1) For those roadmiles adjacent to waterbodies, we recommend that the FEIS indicate which level of abandonment will be applied.

Source Water

In our scoping comments dated September 22, 2005, we provided detailed comments on source water and recommended including a discussion of the sources in the watershed and analyzing the direct, indirect and cumulative impacts to these sources. The DEIS indicates on page 36 that a search of water rights applications, permits, decrees, licenses, claims, and transfers

was made for the Yakus Creek subwatershed, and that thirteen federal, private, and State of Idaho water uses were located (including 2 domestic and stockwater withdrawals from Yakus Creek). The DEIS states that none of the proposed activities would affect water rights, but it does not specify whether any of the proposed activities would potentially impact source water quality.

Recommendation

We recommend including a section on source water, protecting source water, and disclosing any potential effects in the FEIS.